

(b) all determinations made or conclusions reached.

38. Describe and identify all documents relating to the responses to Interrogatories 36 and 37.

39. Describe the circumstances and identify the information relating to all decisions by the Bureau, or any other part of the FCC, to cause Mr. Loginow or any other member of the Commission's staff to conduct any investigation or any testing relating to the Proceeding.

40. Describe all actions taken to conduct any investigation or testing relating to the Proceeding.

41 Identify and describe, or in the alternative provide access for copying, all documents relating to the response to Interrogatory 41.

42. Identify all staff members of the FCC other than Mr. Loginow who have knowledge of any investigation or testing related to the Proceeding, even if such knowledge may not be considered "personal knowledge."

43. Describe and identify all communications, either oral or written, between Mr. Loginow, and any other member of the FCC's staff with knowledge ("personal knowledge" or otherwise) of investigations or testing related to the Proceeding, and Universal Broadcasting of New York, Inc., and/or any representative or employee of Universal Broadcasting of New York, Inc., relating to the Proceeding.

44. Specifically with respect to Mr. Loginow's activities on July 31, 1995, describe exactly what was done to monitor Jukebox Radio, and/or WMG499, and/or W276AQ, Fort Lee, New Jersey, and/or W232AL, Pomona, New York and/or the Monticello Station, including, but not limited to:

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- (a) what equipment was used
- (b) how was such equipment used, including tuning and power levels
- (c) what observations were made
- (d) from what location(s) was monitoring conducted.

45. Describe why "...audio quality of the Fort Lee NJ translator signal, however, indicated that the input signal was NOT off air from Pomona NY...", including what equipment, means or techniques were used to reach such a conclusion.

46. Describe how audio quality was compared with respect to observations in April 1995 and July 1995.

47. Specifically with respect to Mr. Loginow's activities on August 2, 1995:

- (a) identify and describe every item of equipment observed at both FM translators
- (b) for each such item of equipment, describe all observations, conclusions or determinations related to them
- (c) describe how Mr. Turro demonstrated off air reception of the Pomona FM translator by the Fort Lee FM translator while at the Fort Lee FM translator
- (d) describe how Mr. Turro demonstrated off air reception of the Monticello Station by the Fort Lee FM translator while at the Fort Lee FM translator
- (e) describe how Mr. Turro demonstrated off air reception of the Pomona FM translator by the Fort Lee FM translator while at the Pomona FM translator
- (f) describe all filters observed at the Fort Lee FM translator or the Pomona FM translator

48. Describe, identify and define "high quality audio."

49. Describe, identify and define "very high quality audio."

50 Describe, identify and define "moderately good audio."

51. Specifically with respect to Mr. Loginow's activities on April 13 and 14, 1995:

(a) describe how the Fort Lee FM translator was determined to be receiving programming off the air from the Pomona FM translator

(b) describe how the Pomona FM translator was determined to be receiving programming off the air from the Monticello Station

(c) describe and identify the operating power of the Monticello Station

(d) describe all items of equipment observed

(e) describe all inspections and testing undertaken

52. Specifically with respect to Mr. Loginow's activities on May 15, 1995:

(a) describe how and from where the Fort Lee FM translator was monitored

(b) describe and identify "audio quality was considered very high"

(c) describe how low level signals were transmitted, including, but not limited to, by what means such a signal was transmitted, on what frequency(ies), with what equipment, at what power

(d) describe the exact locations of all of the transmitting equipment

(e) describe the antenna type(s) being used

(f) describe the antenna polarization being used

53. Was August 2, 1995, the only day upon which Mr. Loginow, or any other member of the FCC's staff, closely and/or directly inspected the facilities and equipment at the Fort Lee and Pomona FM translators by entry into the enclosures to observe the transmitters, receivers, remote control and power apparatus (*i.e.* was August 2, 1995, the only day inspections and/or

observations were made which were not entirely from outside of those FM translators).

54. If any response to Interrogatory 53 is in the negative, identify all such days other than August 2, 1995, and describe how entry was obtained and what was observed.

55. Describe the circumstances by which Mr. Loginow obtained written statements from Vincent Luna and William Gaghan, including the date(s) such statements were received by Mr. Loginow, the conversations or understandings associated with the receipt of those statements, the means of the delivery of those statements, the purpose(s) offered or intended for those statements.

56. Describe what Mr. Loginow did with the statements provided by Mr. Luna and Mr. Gaghan, including any concurrent or subsequent discussions concerning them.

57. Describe all communications between Mr. Loginow and any representatives or employees of Universal Broadcasting of New York, Inc., including, but not limited to, Mr. Luna and Mr. Gaghan.

58. Describe and identify all other statements, whether written or spoken, from potential witnesses which were obtained by Mr. Loginow or any other member of the Commission's staff.

59. Describe the meaning and/or the intention of Mr. Loginow when, during the August 2, 1995 inspections, Mr. Loginow expressed the view to Mr. Turro that Mr. Turro's operations were not in trouble (*i.e.* not in material violation of FCC rules or policies) but the operations of Mr. Weis were.

60. Describe the instructions given to Mr. Loginow which initiated each of the investigations and/or observations related to the Proceeding.

61. Describe why the HDO makes no reference to Mr. Loginow's inspections and/or observations and/or conclusions and/or determinations concerning the Fort Lee translator and/or the Pomona translator and/or the Monticello Station with respect to the:

- (a) April 13 and 14, 1995, activities of Mr. Loginow
- (b) July 31, 1995, activities of Mr. Loginow
- (c) August 2, 1995, activities of M. Loginow.

Respectfully submitted,

GERARD A. TURRO

By: /s/ Alan Y. Naftalin  
/s/ Alan Y. Naftalin

By: /s/ Charles R. Naftalin  
/s/ Charles R. Naftalin

Koteen & Naftalin, L.L.P.  
1150 Connecticut Avenue, N.W.  
Washington, DC 20036  
(202) 467-5700

August 7, 1997

His Attorneys

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**CERTIFICATE OF SERVICE**

I, Barbara Frank, a secretary in the law offices of Koteen & Naftalin, L.L.P., hereby certify that true copies of the foregoing "INTERROGATORIES OF GERARD A. TURRO TO SERGE LOGINOW, JR. AND THE MASS MEDIA BUREAU" have been served upon the following by first-class United States mail, postage prepaid, this 7th day of August 1997:

\* The Honorable Arthur I. Steinberg  
Administrative Law Judge  
Federal Communications Commission  
2000 L Street, N.W., Room 228  
Washington, D.C. 20554

\* Alan Aronowitz, Esq.  
Hearing Branch  
Enforcement Division  
Federal Communications Commission  
2025 M Street, N.W., Room 7212  
Washington, D.C. 20554

\* Stephen Barone  
Complaints and Investigations Branch  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 8210  
Washington, D.C. 20554

\* Suzan B. Friedman  
Federal Communications Commission  
2025 M Street, N.W., Room 8210  
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1333 New Hampshire Avenue  
Suite 600  
Washington, D.C. 20036

/s/ Barbara Frank  
Barbara Frank

\* By Hand Delivery

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In re

GERARD A. TURRO

For Renewal of License  
for FM Translator Stations  
W276AQ(FM), Fort Lee, NJ, and  
W232AL(FM), Pomona, NY

MONTICELLO MOUNTAINTOP  
BROADCASTING, INC.

Order to Show Cause Why the Construction  
Permit for FM Radio Station WJUX(FM),  
Monticello, NY, Should Not Be Revoked

To: Gerard A. Turro

MM Docket No. 97-122

File Nos. BRFT-970129YC  
BRFT-970129YD

Federal Communications Commission	
Docket No. <u>97-122</u>	Exhibit No. <u>MMB-21</u>
Presented by <u>FCC</u>	
Disposition	Identified <input checked="" type="checkbox"/>
	Received <input checked="" type="checkbox"/>
	Rejected <input type="checkbox"/>
Reporter <u>R</u>	
Date <u>4-24-97</u>	

**MASS MEDIA BUREAU'S FIRST REQUEST FOR ADMISSIONS OF FACT AND  
GENUINENESS OF DOCUMENTS**

The Chief, Mass Media Bureau, pursuant to Section 1.246 of the Commission's Rules, hereby requests that, within ten (10) days of the service of this request, Gerard A. Turro ("Turro") admit to the truth of the following facts and genuineness of the attached documents. Each response shall be labeled with the same number as the subject admission request and shall be made under oath or affirmation by the person making the response. In addition, respondent is reminded that "[a] denial shall fairly meet the substance of the requested admission, and when good faith requires that a party deny only a part or a qualification of a matter of which an admission is requested he shall specify so much of it as is true and deny only the remainder."

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### Admissions

1. On January 23, 1986, the Federal Communications Commission ("FCC") granted the application of Gerard A. Turro ("Turro") application for a construction permit for translator station W276AQ, Ft. Lee, New Jersey.

2. On March 6, 1986, the FCC granted Turro's application for a license to cover the construction of facilities for W276AQ, Ft. Lee, New Jersey.

3. In 1986, Turro sought a waiver of the FCC's rules to originate programming on translator station W276AQ.

4. Turro's request for a waiver of the FCC's rules to originate programming on translator station W276AQ was denied by the FCC.

5. The FCC's denial of Turro's request for a waiver of the FCC's rules to originate programming on translator station W276AQ was upheld by the United States Court of Appeals for the District of Columbia Circuit.

6. In response to an FCC Notice of Inquiry in MM Docket No. 88-140 regarding the use of FM translator stations, Turro requested that the FCC amend its rules to permit the origination of local programming on translator stations.

7. The FCC rejected Turro's proposal that the FCC amend its rules to permit the

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origination of local programming on translator stations.

8. The FCC later reaffirmed its decision not to amend its rules to permit the origination of local programming on translator stations.

9. On December 31, 1992, the FCC granted an application to assign the license of non-commercial educational station WRRH(FM), Franklin Lakes, New Jersey, from Ramapo Indian Hills Regional High School District Board of Directors to Bergen County Community Broadcast Foundation ("BCCBF").

10. The assignment of the license of non-commercial educational station WRRH(FM) to BCCBF was consummated on February 22, 1993.

11. BCCBF is a non-profit entity.

12. At the time it acquired WRRH(FM), BCCBF's Board of Directors consisted of Turro, Jean Swann, and Lee Martin, Jr.

13. BCCBF's studios are located at 75 Second Street, Dumont, New Jersey.

14. The building in which BCCBF's studios are located is owned, directly or indirectly, by Wesley R. Weis ("Weis").

15. Inter City Relay Station WMG-499 is licensed to BCCBF.

16. Inter City Relay Station WMG-499 is located atop a building located at 29 Aladdin Avenue, Dumont, New Jersey.

17. The building on which the facilities for WMG-499 are located is owned, directly or indirectly, by Weis.

18. Effective March 26, 1993, the call letters of WRRH(FM) were changed to WJUX(FM).

19. Non-commercial educational station WRRH(FM) was acquired by BCCBF to be the primary station for translator station W276AQ to rebroadcast.

20. Translator station W276AQ, Ft. Lee, New Jersey, rebroadcast the signal of WJUX(FM), Franklin Lakes, New Jersey, until the latter station went off the air on October 25, 1994.

21. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, that station broadcast the "Jukebox Radio" format programming.

22. BCCBF produced the Jukebox Radio programming.

23. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, BCCBF provided the Jukebox Radio programming to WJUX(FM), Franklin Lakes, via telephone lines.

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24. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, BCCBF provided the Jukebox Radio programming to W276AQ, Ft. Lee, via telephone lines.

25. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, BCCBF provided the Jukebox Radio programming to W276AQ, Ft. Lee, via Inter City relay Station WMG-499.

26. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, BCCBF/WJUX(FM) employed Lee Martin, Jr.

27. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, BCCBF/WJUX(FM) employed Vincent Luna.

28. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, BCCBF/WJUX(FM) employed William Gaghan.

29. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, BCCBF/WJUX(FM) employed Larry Hopper.

30. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, translator station W276AQ received the over-the-air signal of WJUX(FM) for rebroadcast.

31. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, Translator station W276AQ received the signal of WJUX(FM), via Inter City Relay Station

WMG-499 for rebroadcast.

32. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, translator station W276AQ received the signal of WJUX(FM), via telephone lines for rebroadcast.

33. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, BCCBF permitted enhanced underwriting announcements to be broadcast over WJUX(FM).

34. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, commercial advertisements were broadcast over translator station W276AQ between 1992 and October 25, 1994.

35. FM-103, Inc., is a for-profit corporation.

36. FM-103, Inc. is controlled by Turro.

37. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, commercial advertisements for broadcast over W276AQ were sold under the auspices of FM-103, Inc.

38. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, a tertiary tone was used to signal a relay to prevent the commercial announcements broadcast over W276AQ from being broadcast by non-commercial station WJUX(FM).

39. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, while commercial announcements were being broadcast on W276AQ, other material was broadcast over WJUX(FM).

40. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, WJUX(FM), had an effective radiated power of 10 watts.

41. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, the WJUX(FM) signal received over-the-air by W276AQ was of poor audio quality.

42. During the time that WJUX(FM), Franklin Lakes, New Jersey, was operational, when W276AQ rebroadcast the over-the-air signal of WJUX(FM), the W276AQ broadcast signal was of poor broadcast quality.

43. The receipt at the Ft. Lee translator of a stronger over-the-air signal from WJUX(FM), Franklin Lakes, could be simulated by running a telephone line directly into a "dummy load" (*i.e.*, a terminus antenna).

44. Turro became aware of the availability of the construction permit for WXTM(FM), Monticello, New York, in 1994.

45. WXTM(FM) would provide a better signal to translator station W276AQ than would WJUX(FM), Franklin Lakes, New Jersey.

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46. WXTM(FM) was authorized to operate as a commercial FM station.

47. Turro became aware of the availability of the construction permit for WXTM(FM), Monticello, New York, from Larry Fishman.

48. In 1994, Turro understood that he could not be the licensee of both a primary full-power FM station and an FM translator station that rebroadcast the signal of that primary station.

49. In 1994, Turro understood that he could not acquire the construction permit for station WXTM(FM), Monticello, New York, and continue to be the licensee of translator station W276AQ if the translator station was to rebroadcast the signal of that full-service station.

50. On July 25, 1994, an application was filed seeking FCC consent to the assignment of the construction permit for WXTM(FM), Monticello, New York, from Larry Fishman to Monticello Mountaintop Broadcasting, Inc. ("MMBI").

51. Weis is the sole shareholder of MMBI.

52. Turro told Weis of the availability of the WXTM(FM) construction permit from Turro.

53. Turro encouraged Weis to acquire the WXTM(FM) construction permit.

54. On October 14, 1994, an application to assign the WXTM(FM) construction permit to MMBI was granted by the FCC.

55. On October 17, 1994, BCCBF/Turro furnished Weis \$40,000 from BCCBF/Turro as an inducement to enter into a "Network Affiliation Agreement" for WXTM(FM) with BCCBF.

56. The \$40,000 received from BCCBF/Turro was not in the form of a loan, and there is no obligation for repayment of those funds.

57. Attachment I hereto is a true copy of the "Network Affiliation Agreement" entered into between Weis, on behalf of MMBI, and Turro, on behalf of BCCBF.

58. The assignment of the WXTM(FM) construction permit was consummated on October 18, 1994.

59. WXTM(FM) began broadcast operations under MMBI on October 21, 1994.

60. WJUX(FM), Franklin Lakes, New Jersey, ceased broadcast operations on or about October 25, 1994.

61. Funds received from BCCBF/Turro were applied to the purchase price for the WXTM(FM) construction permit.

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62. Funds received from BCCBF/Turro were used to construct the WXTM(FM) facilities.

63. Turro served as the Chief Engineer of WXTM(FM).

64. Turro played a role in the construction of WXTM(FM).

65. BCCBF has provided the Jukebox Radio programming regularly broadcast on WXTM(FM) since it began broadcast operations.

66. When or shortly after WXTM(FM) began broadcast operations, translator station W276AQ(FM), Ft. Lee, New Jersey, began to rebroadcast that signal.

67. Translator station W276AQ received the over-the-air signal of WXTM(FM) for rebroadcast.

68. Translator station W276AQ received the signal of WXTM(FM) via Inter City Relay Station WMG-499 for rebroadcast.

69. Translator station W276AQ received the signal of WXTM(FM) via telephone lines for rebroadcast.

70. The WXTM(FM) signal received over-the-air by W276AQ was of poor broadcast quality.

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71. When W276AQ rebroadcast the over-the-air signal of WXTM(FM), the translator's broadcast signal was of poor audio quality.

72. At the time MMBI acquired WXTM(FM), Weis and Turro shared equal ownership of translator station W232AL, Pomona, New York.

73. Because Turro and Weis shared ownership of translator station W232AL, Pomona, New York, that station did not initially rebroadcast the signal of WXTM(FM), when the station commenced broadcast operations.

74. As of January 10, 1995, Weis transferred his interest in translator station W232AL, Pomona, New York, to Turro.

75. After Weis transferred his interest in translator station W232AL, Pomona, New York, to Turro, that station began to rebroadcast the signal of WXTM(FM).

76. Translator station W232AL received the over-the-air signal of WXTM(FM) for rebroadcast.

77. Translator station W232AL received the signal of WXTM(FM) via Inter City Relay Station WMG-499 for rebroadcast.

78. Translator station W232AL received the signal of WXTM(FM) via telephone lines for rebroadcast.

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79. The WXTM(FM) signal received over-the-air by W232AL was of poor broadcast quality.

80. When W232AL rebroadcast the over-the-air signal of WXTM(FM), the translator's broadcast signal was of poor audio quality.

81. After translator station W232AL began to rebroadcast the signal of WXTM(FM), translator station W276AQ ceased to directly receive and rebroadcast the signal of WXTM(FM).

82. After translator station W232AL began to rebroadcast the signal of WXTM(FM), translator station W276AQ began to receive and rebroadcast the signal of W232AL.

83. Effective April 14, 1995, the call letters of WXTM(FM) were changed to WJUX(FM) (hereinafter, WJUX(FM) refers to the Monticello facility unless otherwise indicated).

84. Weis and Turro have other business relationships in addition to those already referenced herein.

85. WJUX(FM) receives its programming from BCCBF's Dumont studios via telephone lines.

86. Eugene Blabey is the General Manager of WJUX(FM).

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87. Eugene Blabey produces programming for broadcast exclusively on WJUX(FM).

88. Non-Jukebox Radio programming produced for WJUX(FM) is delivered to BCCBF's Dumont studio for inclusion in its programming feed.

89. On April 13 and 14, 1995, Station WJUX(FM) was inspected by an FCC field engineer.

90. At the time of the FCC inspection, WJUX(FM) did not have a dedicated telephone line for the public at the station's main studio.

91. At the time of the FCC inspection, calls from the public were not answered at WJUX(FM)'s main studio.

92. At the time of the FCC inspection, calls from the public to WJUX(FM) were routed to BCCBF's Dumont studios.

93. At the time of the FCC inspection, the WJUX(FM) transmitter was not controlled via remote control from the station's main studio.

94. At the time of the FCC inspection, the WJUX(FM) transmitter was controlled via remote control from BCCBF's Dumont studios.

95. At the time of the FCC inspection, transmitter operating readings and/or log

entries for WJUX(FM) were not taken at that station's facilities.

96. At the time of the FCC inspection, transmitter operating readings and/or log entries for WJUX(FM) were made at BCCBF's Dumont studios.

97. On April 13 and 14, 1995, BCCBF's Dumont studios were inspected by an FCC field engineer.

98. During that inspection, Turro stated to the FCC field engineer that he was the chief operator for WJUX(FM).

99. At the time of the FCC inspection, remote equipment for the control of the WJUX(FM) transmitting equipment was located at BCCBF's Dumont facility.

100. At the time of the FCC inspection, BCCBF's main air studio contained a TC-8 control unit.

101. The TC-8 control unit located at BCCBF's main air studio indicated the source of the audio feed to translator station W276AQ.

102. The TC-8 control unit located at BCCBF's main air studio indicated the source of the audio feed to translator station W232AL.

103. The TC-8 control unit would indicate whether the source of the audio feeds to

the translators was via over-the-air signals.

104. The TC-8 control unit would indicate whether the source of the audio feeds to the translators was via telephone lines.

105. The TC-8 control unit would indicate whether the source of the audio feeds to the translators was via microwave link.

106. During the FCC inspection of WJUX(FM), Monticello, a test was conducted to determine whether personnel at WJUX(FM) could control that station's transmitting facilities.

107. During the FCC inspection of WJUX(FM), Monticello, the field engineer was informed by Eugene Blabey that there was no local transmitter remote control capability at the facilities of WJUX(FM).

108. During the FCC inspection of WJUX(FM), Monticello, the field engineer was informed by Eugene Blabey that the transmitter was controlled by remote equipment in BCCBF's Dumont facility.

109. During the FCC inspection of WJUX(FM), Monticello, the field engineer attempted to determine whether the WJUX(FM) transmitting facility could be controlled via remote equipment at BCCBF's studios in Dumont.

110. During the FCC inspection of WJUX(FM), Monticello, a BCCBF employee was

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instructed to man the WJUX(FM) transmitter remote control equipment.

111. During the FCC inspection of WJUX(FM), Monticello, a BCCBF employee attempted to turn off the WJUX(FM) transmitter via remote control equipment in Dumont.

112. During the FCC inspection of WJUX(FM), Monticello, the BCCBF employee was unable to shut down the WJUX(FM) transmitter via remote control equipment in Dumont.

113. During the FCC inspection of WJUX(FM), Monticello, the WJUX(FM) transmitting equipment could not be shut off.

114. During the FCC inspection of WJUX(FM), Monticello, a BCCBF employee was instructed to operate the master audio control in Dumont which controlled the delivery of the Jukebox Radio programming to WJUX(FM).

115. During the FCC inspection of WJUX(FM), the master audio program delivery control in Dumont was shut off.

116. During the FCC inspection of WJUX(FM), the master audio program delivery control in Dumont was shut off at Turro's instruction.

117. During the FCC inspection of WJUX(FM), Monticello, when the master audio program delivery control was shut off in Dumont, WJUX(FM) received no audio signal

for broadcast.

118. During the FCC inspection of WJUX(FM), Monticello, when the WJUX(FM) transmitter could not be shut down, the audio signal was shut off to simulate a transmitter shut down.

119. All of WJUX(FM)'s programming had originated from BCCBF's Dumont studios.

120. All of WJUX(FM)'s advertising had originated from BCCBF's Dumont studios.

121. BCCBF, FM-103, Inc., and/or Turro sells the advertising time sold on WJUX(FM).

122. There have been interruptions in the delivery of programming from BCCBF's studios to WJUX(FM).

123. Interruptions in the delivery of programming to WJUX(FM) are reported to BCCBF in Dumont.

124. Translator station W276AQ continued to broadcast Jukebox Radio programming at times when there were interruptions in the delivery of programming from BCCBF's studios to WJUX(FM).

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125. There have been interruptions in the broadcast operations of WJUX(FM) since it began broadcasting in 1994.

126. Translator station W276AQ continued to broadcast Jukebox Radio programming at times when there were interruptions in the broadcast operations of WJUX(FM).

127. Translator station W232AL continued to broadcast Jukebox Radio programming at times when there were interruptions in the broadcast operations of WJUX(FM).

128. MMBI receives funds on a monthly basis from BCCBF.

129. The funds received by MMBI from BCCBF are used to operate WJUX(FM).

130. Attachment II hereto is a true copy of a letter, and attachments thereto, from Turro to Norman Goldstein, Chief, Complaints & Investigations Branch, Enforcement Division, FCC, dated July 27, 1995 (with a copy of the FCC letter to which it responds).

131. Attachment III hereto is a true copy of a letter, and attachments thereto, from Weis, on behalf of MMBI, to Norman Goldstein, Chief, Complaints & Investigations Branch, Enforcement Division, Federal Communications Commission (FCC) dated July 27, 1995 (with a copy of the FCC letter to which it responds).

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